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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 JULIO ALVARADO, an individual,
13 Plaintiff,

14 vs.

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16 WILLIAM J. BRATTON; LEE BACA;
17 WILLIAM STONICH, Assistant Sheriff;
18 LARRY W. WALDIE; DOYLE R.
19 CAMPBELL, Assistant Sheriff; PAUL K.
20 TANAKA, Assistant Sheriff; CHARLES
21 JACKSON, Division Chief; MARC L.
22 KLUGMAN, Division Chief individually
23 and in their official capacities; CITY OF
24 LOS ANGELES; CITY OF LOS
ANGELES POLICE DEPARTMENT;
COUNTY OF LOS ANGELES; LOS
ANGELES COUNTY SHERIFF'S
DEPARTMENT

Defendants.

Case No. CV06-7812 PA (RCx)
(Assigned to the Hon. Percy
Anderson)

**PROTECTIVE ORDER
REGARDING DISCLOSURE
OF GAVINO INFORMATION**

DISCOVERY MATTER

25 Pursuant to the stipulation executed by Plaintiff and Defendants, **CITY OF LOS**
26 **ANGELES and the LOS ANGELES POLICE DEPARTMENT**, (City Defendants) the
27 Court issues the following protective order:
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1 **A. ITEMS COVERED BY THIS PROTECTIVE ORDER**

2 1. The protective order applies only to the following:

3 a. The LAPD 8/24/03 arrest report regarding Antonio Gavino, booking
4 #7814104;

5 b. The LAPD booking photograph of Antonio Gavino arising from
6 aforementioned 8/24/03 arrest.

7 2. Should any party wish to stamp any of the above records as "CONFIDENTIAL"
8 that party may not stamp the records in such a way as to cover any written portion of the
9 records. The documents must remain completely legible.
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11 **B. USE OF RECORDS**

12 1. Absent further order of the Court, the items covered by this protective order for
13 this case only, including any appeals, and not for any other purpose whatsoever.

14 2. Items covered by this protective order, including any related copies, summaries,
15 extracts, notes, photographs, memos, audiotapes and transcripts, shall not be disclosed,
16 except to the following persons:

17 a. The attorneys of record, including legal assistants, paralegals,
18 investigators and clerical employees working under counsel's supervision,
19 as well as outside copying, graphic, computer services, and court reporters
20 performing services in connection with this action;

21 b. Experts, consultants, investigators and their employees, retained and/or
22 consulted by the attorneys of record to assist in the preparation of this action;

23 c. The parties, including their officers, agents and employees who are
24 directly assisting counsel with the conduct or resolution of this action;
25 EXCEPT that the items may not be shown to, nor may copies be provided to,
26 the Plaintiff Julio Alvarado unless permitted by the Court.

27 d. Witnesses while being examined by counsel at a deposition or trial.
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1 However, if the item is attached as an exhibit to a deposition transcript, the
2 copy attached as an exhibit shall be redacted to omit names, birth dates,
3 social security numbers, and addresses.

4 3. Before any disclosure of the items covered by this protective order, they will
5 inform any person identified in Paragraph 2 above, of the terms of the protective order.

6 4. If any party wishes to disclose items covered by this protective order to any
7 person other than those listed in Paragraph 2, above, that party shall give written notice
8 to the non-disclosing party so that the non-disclosing party can make a motion to prevent
9 the disclosure. The party wishing to disclose the information will not to do so unless and
10 until agreement with the other party is reached, or the other party's motion is ruled on by
11 the court. If however, the other party does not file its motion within two weeks of the
12 notice, the party wishing to disclose the information may deem the issue to have been
13 abandoned.

14 5. Upon final determination of this action, whether by judgment, settlement or
15 otherwise, including all appeals, and upon the producing party's request, Plaintiff shall
16 return those items, along with all copies, to the producing party. Any messenger or
17 postage fees shall be paid by the requesting party. In the alternative, the producing party
18 may request the items be destroyed.

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1 **C. OTHER**

2 1. The execution of this protective order shall not preclude any party from moving
3 the court for other or further protective orders during this action.

4 2. This protective order is subject to amendment and modification by further
5 stipulation among counsel and/or by order of the Court.

6 ***IT IS SO ORDERED:***

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8 DATED: October 16, 2009

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10 /s/ Rosalyn M. Chapman
11 **ROSALYN M. CHAPMAN**
12 United States Magistrate Judge
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